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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

ARIANE ROWLAND, and JAMIE
SCHULZE

Plaintiff,

vs.

WATCHTOWER BIBLE AND TRACT
SOCIETY OF NEW YORK, INC., and
WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA,

Defendants.

Cause No. CV 20-59-BLG-SPW

**PLAINTIFFS' MOTION FOR
SANCTIONS**

Plaintiffs, by and through undersigned counsel, and pursuant to 28 U.S.C. §
1927 and the Court's inherent authority to sanction lawyers who abuse the judicial
process, hereby move for sanctions to be imposed on Defendant Watch Tower

Bible & Tract Society of Pennsylvania's attorneys, Philip Brumley, Esq., and Joel Taylor, for knowingly:

- Making and perpetuating false statements with the hope that they would be relied on by the Court to dismiss Plaintiffs' case; and
- Unreasonably and vexatiously multiplying these proceedings for the purpose of obstructing Plaintiffs' claims.

A supporting brief is being filed contemporaneously herewith.

Counsel for Defendants were contacted regarding this Motion and stated that they oppose it.

DATED 3rd day of December, 2021.

MEYER, SHAFFER & STEPANS PLLP

By: /s/ Ryan Shaffer
Ryan R. Shaffer
MEYER, SHAFFER & STEPANS PLLP
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

Pursuant to Local Rule 1.4, this document has been served on all parties via electronic service through the Court's Case Management/Electronic Case Filing (CM/ECF) system.

By: /s/ Ryan Shaffer
Ryan R. Shaffer
MEYER, SHAFFER & STEPANS PLLP

Attorneys for Plaintiffs